



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 27 2014

REPLY TO THE ATTENTION OF:

Andrew Hall
Division of Air Pollution Control
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Title V renewal permit, permit number P0109268, for DP&L Monument Substation in Dayton, Ohio. To ensure that the source meets Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments.

1. Most of the citations of the Maximum Available Control Technology (MACT) rule do not follow the Detailed Citation Approach of Engineering Guide 76. They provide the MACT section citations but do not include descriptions of the applicable requirements. Please amend the MACT citations so that they follow the Detailed Citation Approach.
2. For visible emissions, particulate emissions, and sulfur dioxide, the Statement of Basis states that monitoring and emissions testing are unnecessary due to reliance on emission factors or fuel records. Please either include a justification in the Statement of Basis describing the emission factors and calculations and why these are sufficient to assure compliance or include monitoring in the permit.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Kaushal Gupta, of my staff, at (312) 886-6803.

Sincerely,

Genevieve Damico
Chief
Air Permits Section